

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

**NORTH MISSISSIPPI MEDICAL
CENTER, INC.**

PLAINTIFF

V.

CASE NO. 1:23-CV-3-SA-DAS

**QUARTIZ TECHNOLOGIES,
a d/b/a of VALUE ASCENT INC.**

DEFENDANT

MOTION FOR PRELIMINARY INJUNCTION AND EXPEDITED HEARING

Plaintiff North Mississippi Medical Center, Inc. (“*NMMC*”), through its undersigned counsel, pursuant to Rule 65 of the Federal Rules of Civil Procedure, moves the Court for a Preliminary Injunction restraining and prohibiting the Defendant Quartiz Technologies, a d/b/a of Value Ascent, Inc. (“*Quartiz*”) requiring it to return NMMC’s database to NMMC’s control, and in support of this motion shows as follows:

1. On December 5, 2022, NMMC filed a Complaint for Injunctive Relief and Money Damages (the “Complaint”), which is incorporated by reference into this Motion. DE 2. On December 14, 2022, NMMC moved, in state court, for a preliminary injunction and an expedited hearing. That Motion was set to be heard on January 4, 2023. On January 3, 2023, Quartiz removed this action. DE 1.

2. NMMC now asks this Court to grant its preliminary injunction on an expedited basis. This is necessary as Quartiz is holding NMMC’s PeopleSoft database hostage so it can continue to receive substantial payments from NMMC. This ransom plot not only causes NMMC money damages but robs its ability to use and control its data and has caused NMMC to operate without being able to properly apply its tax obligations.

3. In support of its Motion for Preliminary Injunction and Expedited Hearing, NMMC relies on its memorandum brief filed contemporaneously herewith along with the following documents:

Exhibit A – Motion for Preliminary Injunction and Expedited Hearing filed in state court;

Exhibit B – Order Setting Hearing in state court for January 4, 2023;

Exhibit C - NMMC Agreement with Quartiz;

Exhibit D – October 7, 2022 letter from NMMC to Quartiz;

Exhibit E – November 11, 2022 letter from Quartiz to NMMC; and

Exhibit F – Affidavit of John Christopher Davis, MD, MSMI, FACEP, CHCIO.

THIS the 4th day of January, 2023.

RESPECTFULLY SUBMITTED,

/s/Mark N. Halbert

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ATTORNEYS FOR NORTH MISSISSIPPI
MEDICAL CENTER, INC.

CERTIFICATE OF SERVICE

I, Mark Halbert, hereby certify that I have this date filed the above and foregoing document using the ECF filing system which will send notification of same to all counsel of record.

THIS this 4th day of January, 2023.

/s/Mark N. Halbert

Mark N. Halbert